

1 ALICE CHANG (SBN 239761)  
2 alicechangjdba@gmail.com  
3 13048 Del Monte Dr, Apt 42F  
4 Seal Beach, CA 90740  
Telephone: (714) 507-6161

5 Attorneys for Plaintiffs-Relators  
6  
7

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **UNITED STATES OF AMERICA**  
11 *ex rel. IONM LLC*, a Delaware  
corporation and *ex rel. JUSTIN*  
**CHEONGSIATMOY, M.D.; STATE**  
12 **OF CALIFORNIA** *ex rel. IONM*  
LLC, a Delaware corporation and *ex*  
*rel. JUSTIN CHEONGSIATMOY,*  
13 **M.D.; LOS ANGELES COUNTY** *ex*  
*rel. IONM LLC*, a Delaware  
corporation and *ex rel. JUSTIN*  
**CHEONGSIATMOY, M.D.; and**  
14 **JUSTIN CHEONGSIATMOY,**  
**M.D.,** in his individual capacity,

15 Plaintiffs,

16 v.

17 **UNIVERSITY OF SOUTHERN**  
18 **CALIFORNIA**, a California  
corporation,

19 and

20 **USC CARE MEDICAL GROUP,**  
**INC.**, a California corporation,

21 Defendants.

22 Case No. 2:18-cv-08311-WLH (AS)

23 **AMENDED NOTICE OF**  
**REQUEST TO EMAIL**  
**ATTORNEY CHANG BY**  
**FEBRUARY 2, 2024 WITH ALL**  
**TRUE AND CORRECT CASE**  
**CORRESPONDENCE WITH**  
**THE COURT FOR WHICH**  
**ATTORNEY CHANG WAS NOT**  
**INCLUDED**

24 PLEASE TAKE NOTICE of this request to email Attorney Chang by February  
25 2, 2024 with all true and correct case correspondence with the Court for which  
26 Attorney Chang was not included. See Attorney Chang's July 4, 2023 request for all  
27 correspondence with Judge Sagar to include Defendants' unilateral submission of the  
28 "Stipulated" Protective Order to Judge Sagar's chambers, which Judge Sagar granted

1 at Dkt. 180, despite the fact that Defendants' unilateral submission of the "Stipulated"  
2 Protective Order violated both Central District of California Court's Local Rules and  
3 Judge Sagar's own rules. See also Dkt. 239 at Pages 18-20 and 25.

4 Defendants still have not complied with Attorney Chang's January 21, 2024  
5 written request to email Attorney Chang with all ex parte communications Defendants  
6 made in this case and to email Attorney Chang with all records all individuals and/or  
7 parties who signed Exhibit A of the Protective Order, agreeing to be bound by the  
8 terms. See Dkt. 280 at Pages 6-7. Paul Hastings is and was Defendants' counsel of  
9 record including on the dates referenced above. An example referencing Paul Hastings  
10 law firm's ex parte communications with the Court is attached hereto as **Exhibit A**.

11 All parties served with this NOTICE either via the Central District of California  
12 Court Notice of Electronic Filing and/or served via email (see Proof of Service linked  
13 to this Notice) should hereby take notice of this request to email Attorney Chang by  
14 February 2, 2024 with all true and correct case correspondence with the Court for  
15 which Attorney Chang was not included.

16 Dated: February 1, 2024  
17

18 /s/ Alice Chang  
19 Alice Chang, Attorneys for Plaintiff-Relators  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **Exhibit A**

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 11:07 AM

Subject: Redaction Needed in Today's Filing

To: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, paulcane@paulhastings.com <paulcane@paulhastings.com>, alicebrown@paulhastings.com <alicebrown@paulhastings.com>  
Cc: Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Counsel,

It appears Defendants have filed documents containing Plaintiff's social security number. Please contact the clerk of the court and address this today.

Thank you,

Rebekah

From: **Cane, Paul** <paulcane@paulhastings.com>

Date: Fri, May 20, 2022 at 11:14 AM

Subject: Re: Redaction Needed in Today's Filing

To: Bailey, Rebekah <bailey@nka.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

We are contacting the clerk to see if we can file a redacted version. Sorry, that was inadvertent. Is there anything else there that you regard as confidential?

Paul

From: **Bailey, Rebekah** <bailey@nka.com>

Date: Fri, May 20, 2022 at 12:10 PM

Subject: RE: Redaction Needed in Today's Filing

To: Cane, Paul <paulcane@paulhastings.com>

Cc: Jonathan Radke <jradke@nelsonhardiman.com>, Mark Hardiman <mhardiman@nelsonhardiman.com>, Mary Markwell <mmarkwell@nelsonhardiman.com>, Brown, Alice <alicebrown@paulhastings.com>, Kornblit, Michelle <mkornblit@nka.com>, Nelson, Kristine <knelson@nka.com>, Alice Chang JDMBA <alicechangjdba@gmail.com>, Morgan, Matt <morgan@nka.com>, aashish@desai-law.com <aashish@desai-law.com>

Thank you Paul. It appears you also filed his passport number, home address, birthday, and driver's license in violation of the ECF filing certification. Refer to Rule 5.2 and L.R. 5.2-1 for rules on redacting this information.